

From: ["Brooks, Karl" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP \(FYDIBOHF23SPDLT\)/CN=RECIPIENTS/CN=78AC91F4DB6D44F58424B504D5AA3C7D-BROOKS, KARL>](#)
To: [Hammerschmidt](#)
[Ron;Weber](#)
[Rebecca;Tapia](#)
[Cecilia;Hague](#)
[Mark;](#)
CC:
Date: 1/13/2014 6:30:00 AM
Subject: Fw: Fwd: AQI monitoring, North St. Louis County -- Response
Attachments: [AQI monitoring, North St. Louis County -- Response.eml](#)

Pls coord a response w/in r7 and w MDNR. Brief me first re: this and AG letter.

Tx
Karl

From: Agnes Uhls
Sent: Sunday, January 12, 2014 10:41:57 AM
To: Singletary, DeAndre; Thomas, Hattie; Tapia.Celia@epa.gov; Brooks, Karl; Skelley, Dana; Tapp, Joshua; Smith, Mark; Toensing, Don; Werner, Leslye; Lininger, Don; Hammerschmidt, Ron; Houlihan, John; Beringer, Mike
Subject: Fwd: AQI monitoring, North St. Louis County -- Response

--- the forwarded message follows ---

From: ["Agnes Uhls"](#) [REDACTED] FOIA Exemption 6
To: [Lovejoy](#)
[Victoria <victoria.lovejoy@dnr.mo.gov>](mailto:victoria.lovejoy@dnr.mo.gov)
CC:
Date: 1/2/2014 3:39:05 AM
Subject: AQI monitoring, North St. Louis County -- Response

Missouri DNR Air Quality program:

This is a followup to an email requesting comprehensive ambient air monitoring for North St. Louis County. Thank you for considering my concerns and for your service to our state.

In evaluating the links provided in your response, Clean Air Act monitoring stations that cover the North St. Louis County area are no longer operational, or have been reduced to monitoring for 1 air pollutant. The Maryland Heights station is not providing enough data apparently to be listed on the AQI index reports.

My concern is for the landfill gases from the Bridgeton and West Lake Landfills operated by Republic Services in North St. Louis County. I understand that your section of DNR does not specifically address landfill gases. However, some of the AQI gases are included in the current landfill monitoring but are of questionable validity and will be used in an environmental data evaluation by DHSS for its evaluation of public health concerns in this area. My hope is that input from the Clean Air monitoring section of DNR might address these issues.

The usual response from DNR or DHSS is to refer to the current AreaRAE monitoring data. While these do monitor some of the Clean Air Act gases, they do not monitor for particulates, ozone, lead or CO. As for NO₂ and SO₂, the health effects from this combination are of concern, but DHSS does not combine them when it interprets this data. These are the gases and monitoring that I am requesting DNR re-evaluate.

The monitors currently being used at this landfill complex are not built to work under such conditions for continuous comprehensive air testing, and require the performance of regular calibration and battery changes. Are these monitors capable of being relied upon through all weather conditions? It is my contention that the current AreaRAE is inadequate to monitor for Clean Air Act gases and particulates.

A growing number of residents, local and state legislators, and Attorney General Koster question the public health awareness of Republic Services, which has frequently been found negligent in operating the landfill gas retrieval system, especially concerning methane for many years, and other landfill gases at unacceptable levels during fire (SSE) conditions. DNR appears to tolerate these continuous deviations from guidelines for emissions from hazardous/municipal solid waste landfills. DNR also refers those who complain about the ongoing violations to the DHSS Epidemiology department as the decisionmaker on public health policy and air monitoring.

Because DNR now has the responsibility of enforcing the Clean Air Act in Missouri, DNR is the responsible agency

for all air monitoring as relates to public health, and should be the lead agency in making policy decisions for air monitoring.

In a general read of the links you have provided, it is obvious that for some unknown reason the monitoring of North St. Louis County air is minimal to none. You ask for suggestions for the AQI monitoring, and it is my opinion from a common-sense layperson point of view that comprehensive long-term monitoring needs to be implemented in North St. Louis County given the landfill emissions which are obvious from the public concerns, the fires in the landfills in the past and the current 3-year-old fire, and given the St. Louis area noncompliance for VOCs and NOx. From a read of the EPA guidelines for landfill emissions from 2006, it appears violations and deviations are not allowed, and releases of gases with equipment breakdowns and mismanagement are not allowed, and that all parts of the landfill are considered in violation if 1 landfill is in violation. The landfill gases even after extraction and treatment are not to be released into ambient air, yet untreated gas is being released. None of these owner/operator requirements seems to deter Republic Services from continuing to violate. The DNR statement: "Reductions in monitored pollutant concentrations and odor trends have been observed as corrective actions have occurred at the landfill", does not apply to the current situation as recently DNR has misplaced some public odor comments and numerous statements from Republic through the DNR website refer to issues at the landfill causing odors after the capping of the South Quarry, most recently the very large leachate spill, the sump malfunction, the leachate tank installation process, gas-extraction well issues, etc. Staying current with the issues Republic

has, and the complaints the public has is no doubt a complex regulatory situation.

Given the lack of stewardship that Republic has demonstrated repeatedly, I question whether DNR can “trust” the proper operation of the air monitors currently used there. Adding to the questionable results is the inability of DHSS to mathematically interpret discredited higher readings due to weather conditions, or obtain accurate exceedance readings in compliance with Clean Air Act regulations, or enforce regulations despite inadequate data due to equipment malfunction. It appears to us who review the data that the current monitoring is not accurate nor adequate for North County, and that relying on occasional comprehensive testing and temporary emergency equipment for some reason has become acceptable to the state regulatory agencies.

From this department's previous response to my concerns, it is still not clear why the air monitoring section(s) of DNR continue to defer to the current monitoring regimen at Bridgeton/West Lake landfills for North County. Hopefully these comments can be addressed from the standpoint of DNR's public health policy as Clean Air Act enforcer.

I ask DNR to consider expanding testing to all of the CAA gases/particulates in Maryland Heights, and consider the possibility that compliance issues across boundaries might be aided by more monitoring in North County.

Thank you for your time and consideration of my concerns.

Agnes Uhls

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